

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

DEREK KHANNA, individually and
derivatively, On behalf of Shimbly Corp

Plaintiff,

vs.

KATELYNN BANKS, et. al

21 cv 5752

Judge Virginia M. Kendall
Magistrate Judge:
Keri Holleb-Htaling
JURY DEMANDED

Defendants.

**DEFENDANTS BANKS & SHIMBLY CORP UNOPPOSED FIRST MOTION FOR
EXTENSION OF TIME TO ANSWER OR OTHERWISE PLEAD**

NOW COME Defendants KATELYNN BANKS, and SHIMBLY CORPORATION and by their attorneys, Troy S. Radunsky, Jason E. DeVore and Jorie R. Johnson of DEVORE RADUNSKY LLC, pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, move this Honorable Court to extend the time period with which to answer or otherwise plead. In support thereof, Defendants state as follows:

1. On March 28, 2025 Plaintiff filed his Second Amended Verified Complaint. (Dkt. 292).
2. Defendant Banks and Shimbly recently substituted counsel on May 1, 2025.
3. Among other things, Defense Counsel's firm has been preparing for a May 12, 2025, trial in DeKalb County. Due to other pressing deadlines, including scheduled hearings (May 9) and upcoming evidence depositions (May 5-6) Defendant requests an extension of time or until June 6, 2025, to file her answer and affirmative defenses to Plaintiff's Second Amended

Complaint.

4. Granting Defendants' motion will not prejudice Plaintiff and this motion is not being interposed for any improper purpose.

5. Plaintiff's Counsel did not object to this motion.

WHEREFORE, Defendant KATELYNN BANKS, and SHIMBLY CORPORATION pray that this Honorable Court enter an order as follows:

1. Defendants' motion is granted;
2. Defendants' are granted until June 6, 2025 to file their Answer to Plaintiff's Second Amended Complaint.

Respectfully Submitted,

DeVore Radunsky LLC

By: /s/ Troy S. Radunsky
Troy S. Radunsky, One of
the attorneys for Defendant,
Katelynn Banks

DEVORE RADUNSKY LLC

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CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that **Defendants Unopposed First Motion for Extension of Time** was filed on April 30, 2025, with the Northern District of Illinois ECF System, serving a copy to all parties.

//s/ Jason E. DeVore
Jason E. DeVore